

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JONATHAN HARRIS,

**NOTICE OF MOTION**

Plaintiffs,

15 CV 8456 (CM)

-against-

CITY OF NEW YORK; Detective BRIAN TAYLOR,  
Shield No. 4438; Police Officer NEIL MAGLIANO, Shield  
No. 2766; Police Officer SEAN NOCE, Shield No. 31328;  
Detective JUSTIN PARRIS, Shield No. 22965; Sergeant  
WESLEY FRADERA, Shield No. 4246,

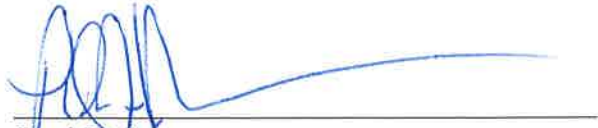
Defendants.  
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**PLEASE TAKE NOTICE** that the undersigned will move this Court, before the Honorable Colleen McMahon, at the United States Courthouse for the Southern District of New York, located at 500 Pearl St., New York, NY, on a date to be determined by the Court, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, limited at this time to the issue of qualified immunity, dismissing plaintiff's complaint against defendants City of New York, Detective Brian Taylor, Police Officer Neil Magliano, Police Officer Sean Noce, Detective Justin Parris and Sergeant Wesley Fradera with prejudice, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
August 30, 2016

ZACHARY W. CARTER  
Corporation Counsel of the  
City of New York  
*Attorney for Defendants City, Taylor, Magliano and  
Noce*  
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By:



Paul H. Johnson

Assistant Corporation Counsel

Special Federal Litigation Division

To: VIA ECF  
Gabriel Harvis, Esp. (via ECF)  
*Attorney for Plaintiff*